

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**TYHEE HICKMAN, SHANAY BOLDEN,  
and O'DONALD HENRY, individually and  
on behalf of all persons similarly situated,**

**Plaintiffs,**

**v.**

**TL TRANSPORTATION, LLC, SCOTT  
FOREMAN, HERSCHEL LOWE,  
AMAZON.COM, LLC, and AMAZON  
LOGISTICS, INC.**

**Defendants.**

**Civil Action No.: 2:17-cv-01038-GAM**

**Class & Collective Action**

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**DECLARATION OF RYAN ALLEN HANCOCK IN SUPPORT OF  
PLAINTIFFS' UNOPPOSED MOTION FOR ATTORNEYS' FEES AND COSTS**

I, Ryan Allen Hancock, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am a member in good standing of the bar of the Commonwealth of Pennsylvania, and I am admitted to this Court. I respectfully submit this declaration in support of Plaintiffs' Unopposed Motion for Approval of Attorneys' Fees and Costs. The following is based on my personal knowledge, and if called upon to do so, I could and would competently testify thereto.

2. For more than nine years, I was the Assistant Chief Counsel for the Pennsylvania Human Relations Commission, for the Commonwealth of Pennsylvania's Civil Rights Enforcement Agency. I am currently a partner and Chair of the Employment Law Department of Willig, Williams & Davidson located at 1845 Walnut Street, 24<sup>th</sup> Floor Philadelphia, PA 19103. Throughout my career, I have focused on representing individuals (or groups of individuals) in litigation related to their employment. I have represented employees in hundreds of administrative

claims and lawsuits in state and federal district courts across the country, including wage-and-hour cases involving allegations of off-the-clock work and unpaid overtime compensation.

3. I am licensed in good standing to practice in all state courts in the Commonwealth of Pennsylvania, the State of New York, United States District Court for the Eastern District of Pennsylvania, the United States Court of Appeals for the Third Circuit, and United States District Court for the Northern District of Illinois. I have never been sanctioned, disciplined, or otherwise admonished by any bar organization. I have never been denied *pro hac vice* admission in any court, nor has any court revoked my *pro hac vice* admission. No court has ever refused to certify (or conditionally certify) a class or collective action based on my inadequacy as class counsel.

4. The majority of my practice is devoted to employment law, which includes wage-and-hour litigation. I have litigated against companies in almost every industry, and I have litigated against many of the preeminent defense firms in the area of employment litigation. Further, I have served as class counsel in class-action wage-and-hour lawsuits, including *Dale Ramtoun v. Brendan Stanton, Inc.*, Case No. 2:15-cv-04941 (E.D. of Pennsylvania); *Douglas Salomone, et al. v. Urge Productions, LLC and Aaron Kaufman*, Index No. 651220/2015 (N.Y. Sup. Ct.); *David Johnson, et al. v. Ronak Foods, LLC, et al.*, Case No. 001090 (Ct. of Com. Pl. of Philadelphia Cnty.); *Karel Alvarez et al. v. BI Incorporated*, Case No. 2:16-cv-02705 (E.D. of Pennsylvania); *Maria Devlin et al. v. Ferrandino & Son, Inc.*, Case No. 2:15-v-04976 (E.D. of Pennsylvania); *Hector Ayala Herrera et al. v. Rolling Green Landscape and Design, Inc. et al.*, Case No. 2:17-cv-03176 (E.D. of Pennsylvania); *Shasay Morgan et al. v. RCL Management, Inc., et al.*, Case No. 2:18-cv-00800 (E.D. of Pennsylvania); *Kim Channay Hauser v. Patriot Home Care, Inc.*, Case No. 2:18-cv-03126 (E.D. of Pa.); *Frederich Green et al. v. Amazon.com, LLC, et al.*, Case No. 1:18-cv-1032 (M.D. of South Carolina); *Gaines v. Amazon.com, LLC, et al.*, Case

No. 1:19-cv-00528 (N.D. of Georgia); *Priestley Faucett v. Amazon.com, LLC, et al.*, Case No. 1:18-cv-08066 (N.D. of Illinois); *Heather Gongaware v. Amazon.com, LLC, et al.* Case No. 1:18-cv-08358 (N.D. of Illinois); *Andrea Thomas et al. v. JSTC, LLC*, Case No. 6:19-cv-01528 (M.D. of Florida); and *Christopher Johnson, et al. v. Trinity Couriers, Inc., et al.* Case No. 1:19-cv-686 (S.D. of Ohio).

5. In the prosecution of this case, my firm served as Co-Lead Counsel, and worked with Berger & Montague, P.C. Our firms worked together to divide assignments, avoid duplication of effort and accomplish all tasks in the most efficient manner possible.

6. As of December 30, 2019, the total number of recorded hours spent on this litigation by Willig, Williams & Davidson is 229.20, and the total lodestar amount for attorney and support staff time, based on the firm's current rates, is \$102,013.50. The hourly rates show below are the usual and customary rates charged for each individual in all of our cases. A breakdown of my firm's lodestar is reflected below:

Name	Position	Hours	Rate	Lodestar
Ryan Allen Hancock	Partner	221.50	\$450.00	\$99,675.00
Bruce Ludwig	Partner	3.60	\$450.00	\$1,620.00
Donna Wozniak	Paralegal	4.10	\$175.00	\$717.50
<b>TOTAL</b>		<b>229.20</b>		<b>\$102,013.50</b>

7. Due to the amount of privileged information contained in Willig, Williams & Davidson's actual hourly billing records, those detailed records are not attached here, but can easily be provided for this Court's *in camera* review should the Court wish to review them.

8. The hourly rates for the partner and professional staff are the same as would be charged in non-contingent matters.

9. The time reflected above was time actually spent, in the exercise of reasonable

judgment, by the attorneys and staff involved. Class Counsel was careful not to expend unnecessary hours and not to duplicate work done by others. The time submitted herein reflects only work done on behalf of the named Plaintiffs, Settlement Class Members, or at the request of Class Counsel.

10. As settlement administration is ongoing, and based on my experience in previous employment cases, I estimate that Willig, Williams & Davidson's lodestar will be at or near approximately \$104,263.50 by the time the Claims Submission period ends, due to the need to work with Berger & Montague in coordinating with the Claims Administrator, communicating with Settlement Class Members, overseeing the Notice and Claims process, drafting the Motion for Final Approval of the Settlement Agreement, and attending the Final Approval hearing that is currently scheduled for February 18, 2020.

11. As of December 30, 2019, my firm expended costs in the amount of \$302.92 to prosecute this action, as follows:

<b>Expense</b>	<b>Amount of Expense</b>
Copying Fees	\$291.49
Travel	\$11.43
<b>TOTAL</b>	<b>\$302.92</b>

12. The expenses incurred pertaining to this case are reflected in the books and records of this firm. These books and records are prepared from expense vouchers and check records and are an accurate record of the expenses incurred. All of the expenses incurred were reasonable and necessary to the prosecution of this case.

13. Class Counsel anticipate that there may be additional expenses in administering the settlement and preparing for and attending the Final Approval Hearing in Philadelphia Pennsylvania, and respectfully request the opportunity to request additional reimbursement of such reasonable expenses at the time distribution is made.

Dated: December 30, 2019



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Ryan Allen Hancock  
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*Attorney for Plaintiffs and  
Settlement Class Members*